

1 RODNEY S. DIGGS, Esq. (SBN 274459)  
Email: RDiggs@imwlaw.com  
2 IVIE McNEILL WYATT PURCELL & DIGGS  
444 South Flower Street, Suite 3200  
3 Los Angeles, California 90071  
Telephone: (213) 489-0028  
4 Facsimile: (213) 489-0552  
Attorneys for Plaintiff, STEFFON BARBER

5 LAW OFFICES OF DALE K. GALIPO  
6 Dale K. Galipo, Esq. (SBN 144074)  
dalekgalipo@yahoo.com  
7 Renee V. Masongsong, Esq. (SBN 281819)  
rvalentine@galipolaw.com  
8 21800 Burbank Boulevard, Suite 310  
Woodland Hills, CA 91367  
9 Tel: (818) 347-3333  
Fax: (818) 347-4118

10 Attorneys for Plaintiff STEFFON BARBER

11  
12 **UNITED STATES DISTRICT COURT**  
13 **CENTRAL DISTRICT OF CALIFORNIA**

14  
15 STEFFON BARBER, an individual,

16 Plaintiff,

17 vs.

18  
19 COUNTY OF SAN BERNARDINO and  
CHRISTOPHER ALFRED,

20  
21 Defendants.

CASE NO.: 5:22-cv-00625-KK-DTB

Assigned to:  
Hon. District Judge Kenly Kiya Kato

**DECLARATION OF RENEE V.  
MASONGSONG IN SUPPORT OF  
PLAINTIFF'S OPPOSITION TO  
DEFENDANTS' MOTION FOR  
SUMMARY JUDGMENT;  
EXHIBITS THERETO**

Date: November 13, 2025  
Time: 9:30 a.m.  
Crtrm: 3

[Memorandum of Points and  
Authorities in opposition to Defendants'  
motion for summary judgment; Separate  
Statement; Declaration of Scott DeFoe;  
Declaration of Robert Morales filed  
concurrently herewith]

**DECLARATION OF RENEE V. MASONGSONG**

I, Renee V. Masongsong, hereby declare as follows:

1. I am an attorney duly licensed to practice law in the State of California and the United States District Court for the Central District of California. I am one of the attorneys of record for Plaintiff Steffon Barber. I make this declaration in support of Plaintiff's Opposition to Defendants' Motion for Summary Judgment. I have personal knowledge of the facts contained herein and could testify competently thereto if called.

2. Attached hereto as **Exhibit 1** is a true and correct copy of the relevant portions of the reporter's transcript of the Deposition of Defendant Christopher Alfred, as taken on August 26, 2025.

3. Attached hereto as **Exhibit 2** is a true and correct copy of the relevant portions of the reporter's transcript of the Deposition of Plaintiff Steffon Barber, as taken on September 9, 2025.

4. Attached hereto as **Exhibit 3** is a true and correct copy of the verdict form in the case *Archibald v. County of San Bernardino*, case number 5-16-cv-1128.

5. Attached hereto as **Exhibit 4** is a true and correct copy of the verdict form in the case *V.R. v. County of San Bernardino*, case number 5:19-cv-01023-JGB-SP.

I declare under penalty of perjury under that the foregoing that the foregoing is true and correct. Executed on this 23rd day of October, 2025.

/s/ Renee V. Masongsong

Renee V. Masongsong